

Stauffer Management Company

Concord Pike and New Murphy Road
Wilmington Delaware 19897
Telephone (302) 886-3000 Fax (302) 886-2952

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(Red)

May 14, 1993

Joan Armstrong (3HW11)
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

Re: Standard Chlorine Superfund Site
Delaware City, Delaware

Dear Ms. Armstrong:

This letter is submitted on behalf of Stauffer Chemical Company ("Stauffer") in response to EPA's letter to Stauffer Management Company c/o ZENECA, dated April 16, 1993 and received on April 28, 1993. That letter requests information relating to the Standard Chlorine Superfund Site, Delaware (the "Site") pursuant to CERCLA §104 and 42 U.S.C. §9604. Stauffer Management Company, an affiliate of ZENECA, Inc. (formerly ICI Americas Inc.), is responding to this request on behalf of Stauffer pursuant to certain contractual indemnities. Stauffer, as such, no longer exists; its legal successor is Rhone-Poulenc Inc.

This response is based on currently available information and our investigation to date. It is not intended to be, nor should it be construed as, an admission of liability on the part of Stauffer or any affiliate. Stauffer reserves the right to supplement this response in the event that it becomes aware of any additional facts or information regarding this Site.

Stauffer Management Company provides the following responses to the specific requests for information:

- 1.(a-e) We have been unable to locate any information or documents indicating that Stauffer owned the Site prior to 1960. If EPA has information or documents indicating that Stauffer owned the Site, I would appreciate receiving such information.
2. In July, 1987, Imperial Chemical Industries PLC ("ICI PLC") purchased Stauffer from Chesebrough-Ponds Inc. In October, 1987, ICI PLC sold the Basic Business of Stauffer to Rhone-Poulenc Inc. Rhone-Poulenc Inc. is the corporate legal successor by merger to Stauffer. Pursuant to certain contractual indemnities, Stauffer Management Company (a sister company to ZENECA Inc.) has agreed to defend Rhone-Poulenc Inc. in connection with Stauffer's liabilities, if any, at this Site.

ZENECA Holdings Inc. (formerly ICI American Holdings Inc.) is the parent of ZENECA Inc. (formerly ICI Americas Inc.) and Stauffer Management Company.

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- (a) Enclosed are copies of the Purchase Agreement between Chesebrough-Ponds Inc. and Imperial Chemical Industries Inc. ("ICI PLC") dated June 5, 1987 and the Purchase Agreement between ICI PLC and Rhone-Poulenc Inc. dated September 18, 1987.
- (b) There would have been numerous corporate officers and majority shareholders for the entities identified above. Therefore, Stauffer Management Company hereby objects to this inquiry because it would be unduly burdensome to provide such information at this time. In addition, such information is not relevant to the Site.
- (c) Stauffer Chemical Company: 1895, California - Stauffer Chemical Company no longer exists.

Stauffer Management Company: July 15, 1987, Delaware.

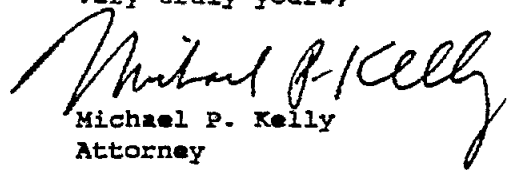
ICI Americas Inc.: April 22, 1971, Delaware

ICI American Holdings Inc.: May 12, 1971, Delaware

SENECA Inc.: April 22, 1971, Delaware (formerly ICI Americas Inc.)

Kim D. Root, Sr. Paralegal, Wilmington, Delaware, 19897, assisted me in the preparation of the above responses.

Very truly yours,


Michael P. Kelly
Attorney

MPK:kdc
Enclosures
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